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**November 1, 2023**

**Via ECF**

Hon. Jesse M. Furman, USDJ  
United States District Court, SDNY  
500 Pearl Street  
New York, NY 10007

**Re: Gayle v. Advanced Clean-Up Technologies Inc. et al**  
**Case No. 23-CV-04987 (JMF)(SLC)**  
**Joint Request for Stay, etc.**

Dear Judge Furman:

My firm represents Plaintiff in the above-referenced action. After conferring with defense counsels, I respectfully write on behalf of all parties to request a 30-day stay of Plaintiff's time to respond to the motion to compel of Defendant Advanced Clean-Up Technologies Inc., and of the discovery plan/deadlines in this case.

Notably, after the failed mediation on September 13, 2023, Defendant Advanced Clean-Up Technologies Inc. retained new counsel and is now in favor of attempting settlement and resolution of the entire case. As such, the parties intend to continue settlement discussions and attempt to resolve this matter within the period of the stay.

We thank the Court in advance for its time and consideration.

Respectfully submitted,  
Abdul Hassan Law Group, PLLC  
/s/ Abdul Hassan

By: Abdul K. Hassan, Esq.

**cc: Defense Counsels via ECF**

In lieu of a stay, the Court grants an extension of all deadlines of 30 days. In light of that, the pretrial conference scheduled for February 15, 2024, is ADJOURNED to March 14, 2024 at 9:00 am. The Clerk of Court is directed to terminate ECF No. 50. SO ORDERED.

  
November 2, 2023